

# **EXHIBIT A**

FILED by Macomb County Circuit Court  
3/12/20252025-001039-NO  
STRAHAN, CHRISTOPHER VS. SPEEDWAY LLC  
2nd copy - Plaintiff  
3rd copy - Return

Approved, SCAO

Original - Court  
1st copy - Defendant

STATE OF MICHIGAN JUDICIAL DISTRICT 16th JUDICIAL CIRCUIT COUNTY	SUMMONS	CASE NUMBER 2025- 1039 NO
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Court address  
40 N. Main St. Mt. Clemens, MI 48043Court telephone number  
586-469-5351

Plaintiff's name, address, and telephone number CHRISTOPHER STRAHAN
Plaintiff's attorney bar number, address, and telephone number FEMMININEO ATTORNEYS, PLLC 586-954-9500 David C. Femminineo P56471 Bartosz A. Kmiec P71669 110 S. Main St. Mt. Clemens, MI 48043

Defendant's name, address, and telephone number Speedway, LLC Resident Agent: Corporate Creations Network Inc. 28175 Haggerty Rd. Novi, MI 483 7 7
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v

**Instructions:** Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (MC 21). The summons section will be completed by the court clerk.

**Domestic Relations Case**

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

**Civil Case**

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in ☐ this court, ☐ \_\_\_\_\_ Court, where

it was given case number \_\_\_\_\_ and assigned to Judge \_\_\_\_\_

The action ☐ remains ☐ is no longer pending.

Summons section completed by court clerk.

**SUMMONS****NOTICE TO THE DEFENDANT:** In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party **or take other lawful action with the court** (28 days if you were served by mail or you were served outside of Michigan).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date 3/11/2025	Expiration date* 6/10/2025	Court clerk <i>Anthony F. Forlani</i>
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\*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

SEAL OF ANTHONY F. FORLANI  
MCL 2.102(B), MCR 2.103, MCR 2.104, MCR 2.105

Summons (3/23)

Case Number 2025- NO

**PROOF OF SERVICE**

**TO PROCESS SERVER:** You must serve the summons and complaint and file proof of service with the court clerk before the expiration date on the summons. If you are unable to complete service, you must return this original and all copies to the court clerk.

**CERTIFICATE OF SERVICE / NONSERVICE**

- ☐ I served ☐ personally ☐ by registered or certified mail, return receipt requested, and delivery restricted to the addressee (copy of return receipt attached) a copy of the summons and the complaint, together with the attachments listed below, on:
- ☐ I have attempted to serve a copy of the summons and complaint, together with the attachments listed below, and have been unable to complete service on:

Name	Date and time of service
Place or address of service	
Attachments (if any)	

- ☐ I am a sheriff, deputy sheriff, bailiff, appointed court officer or attorney for a party.
- ☐ I am a legally competent adult who is not a party or an officer of a corporate party. I declare under the penalties of perjury that this certificate of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee \$	Miles traveled	Fee \$	
Incorrect address fee \$	Miles traveled	Fee \$	<b>TOTAL FEE</b> \$

Signature

Name (type or print)

**ACKNOWLEDGMENT OF SERVICE**

I acknowledge that I have received service of a copy of the summons and complaint, together with

Attachments (if any) on Date and time

Signature on behalf of

Name (type or print)

FILED by Macomb County Circuit Court  
3/12/2025

2025-001039-NO  
STRAHAN, CHRISTOPHER VS. SPEEDWAY LLC

STATE OF MICHIGAN  
IN THE CIRCUIT COURT FOR THE COUNTY OF MACOMB

CHRISTOPHER STRAHAN,

Plaintiff,

vs.

Case No. 25-1039 -NO

SPEEDWAY, LLC, a  
foreign limited liability company,

**MATTHEW P. SABAUGH**

Defendant,

\_\_\_\_\_  
FEMMININEO ATTORNEYS, PLLC  
DAVID C. FEMMININEO (P56471)  
BARTOSZ A. KMIEC (P71669)  
Attorney for Plaintiff  
110 South Main Street  
Mt. Clemens, MI 48043  
(586) 954-9500 (586) 954-9900 fax  
[Bart@getdavidgetpaid.com](mailto:Bart@getdavidgetpaid.com) -handling atty  
[Diana@getdavidgetpaid.com](mailto:Diana@getdavidgetpaid.com) - asst.

**Femminineo**

110 S Main street  
Mt. Clemens, MI 48043  
586-954-9500

\_\_\_\_\_  
*There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the Complaint.*

/s/ David C. Femminineo  
DAVID C. FEMMININEO (P56471)

COMPLAINT AND DEMAND FOR JURY TRIAL

NOW COMES Plaintiff, CHRISTOPHER STRAHAN, by and through his attorneys, FEMMININEO ATTORNEYS, PLLC and DAVID C. FEMMININEO, and for his Complaint and Demand for Jury Trial, states as follows:

1. That Plaintiff, CHRISTOPHER STRAHAN, has and at all times pertinent hereto been a resident of the City of Sterling Heights, County of Macomb, and State of Michigan.
2. At all times hereinafter mentioned prior and subsequent thereto, Defendant, SPEEDWAY, LLC, is a foreign limited liability company, duly organized

under the laws of the State of Delaware, authorized to do and doing business in the State of Michigan having a place of business located in the County in which this matter is filed and having a resident agent listed with as Corporate Creations Network, Inc. 28175 Haggerty Road Novi, MI 48377.

3. That the amount in controversy is in excess of Twenty-Five Thousand (\$25,000.00) Dollars, exclusive of costs, interest, or attorney fees, and is properly within the jurisdiction of this Court.
4. At the time and place aforementioned, Defendant, SPEEDWAY, LLC, upon information and belief, was and still is engaged in the exclusive ownership, maintenance, management, possession and control of the location at 11651 15 Mile Road, in the City of Sterling Heights, County of Macomb, State of Michigan.
5. On or about May 16, 2024, Plaintiff was a "Invitee", "Business Invitee" or "Licensed Invitee" on Defendant's premises.
6. On the aforesaid date, Plaintiff, CHRISTOPHER STRAHAN, was proceeding through the SPEEDWAY store due to water on floor and worn out entrance mat which allowed water to accumulate, was caused to fall violently to the ground, which "injury site" is under the exclusive ownership, maintenance, management, control and possession of the Defendant, SPEEDWAY, LLC.
7. That at the time, place and location of the above mentioned, it was the duty of the Defendant, SPEEDWAY, LLC, by their agents and/or employees acting on their behalf to exercise reasonable care and caution in and about the maintenance and management of said premises, and to keep the same in

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reasonable safe condition for the Plaintiff, CHRISTOPHER STRAHAN, and other persons lawfully upon said premises, and in accordance with the laws of the State of Michigan, the rules of Common Law and the Ordinances of the Township of Macomb.

8. That, disregarding those duties, the Defendant, SPEEDWAY, LLC, by its agents and employees, failed to exercise reasonable and ordinary care and caution in the maintenance of the injury site, and, in fact, created the dangerous condition in the following manner, to wit: Carelessly and negligently allowed and permitted water to accumulate on worn out entrance mat area to become and remain in dangerous, defective and hazardous condition which caused the severe, painful and disabling personal injuries to Plaintiff, CHRISTOPHER STRAHAN, as hereinafter set forth.
9. That Defendant, SPEEDWAY, LLC, by its agents and employees, was then and there guilty of one or more of the following negligent acts or omissions in violation of its duties to Plaintiff, CHRISTOPHER STRAHAN:
  - a. Failing to provide a reasonable safe area on which to walk;
  - b. Failing to keep the surface free from hazardous, unsafe and dangerous conditions, including clear slippery substances;
  - c. Failing to timely and adequately inspect the area so as to eliminate hazards and dangerous conditions, including hazards from clear slippery substances;
  - d. Failing to timely remove or eliminate the hazardous and unsafe conditions and/or failing to warn Plaintiff and the general public of the same;
  - e. Failing to take other precautionary measures to make the area safe from the general public and or Plaintiff, CHRISTOPHER STRAHAN;

- f. Creating the dangerous condition by failing to provide alternative avenues of ingress and egress in the area.

10. That in the happening of the incident, Plaintiff, CHRISTOPHER STRAHAN, was not guilty of negligence or comparative negligence but that as a direct and proximate result of the negligence and carelessness of the said Defendant, SPEEDWAY, LLC, Plaintiff suffered injuries and damages to wit:

- a. Back, knees and right hand;
- b. Severe humiliation, embarrassment and emotional distress as well as depression;
- c. Loss of enjoyment of the normal activities of life which preclude Plaintiff from participating in sports and other recreational activities, which loss is permanent;
- d. Plaintiff has incurred and spent considerable sums of money and time for hospital bills, doctor bills, medications and treatment of the injuries and will continue to do so in the future;

11. That prior to this incident Plaintiff, CHRISTOPHER STRAHAN, was a reasonably strong, healthy and able-bodied person.

WHEREFORE, Plaintiff prays that judgment awarded in favor of Plaintiff and against Defendant, SPEEDWAY, LLC, for whatever amount Plaintiff is found to be entitled (MCR 2.111, 1985 as amended), in excess of Twenty-Five Thousand (\$25,000.00) Dollars, plus interest, costs and attorney fees.

Respectfully submitted,

/s/ David C. Femminineo  
DAVID C. FEMMININEO (P56471)  
FEMMININEO ATTORNEYS, P.L.L.C.  
Attorneys for Plaintiff  
110 South Main Street  
Mt. Clemens, MI 48043  
586.954.9500

Dated: March 11, 2025

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Law

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STATE OF MICHIGAN  
IN THE CIRCUIT COURT FOR THE COUNTY OF MACOMB

CHRISTOPHER STRAHAN,

Plaintiff,

vs.

Case No. 25-1039 -NO

SPEEDWAY, LLC, a  
foreign limited liability company,

**MATTHEW P. SABAUGH**

Defendant,

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FEMMININEO ATTORNEYS, PLLC  
DAVID C. FEMMININEO (P56471)  
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Attorney for Plaintiff  
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[Diana@getdavidgetpaid.com](mailto:Diana@getdavidgetpaid.com) - asst.  
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DEMAND FOR JURY TRIAL

NOW COMES Plaintiff, CHRISTOPHER STRAHAN, by and through his attorneys, FEMMININEO ATTORNEYS, P.L.L.C., and hereby demands a trial by jury of the within cause.

Respectfully submitted,

BY: /s/David C. Femminineo  
DAVID C. FEMMININEO (P56471)  
FEMMININEO ATTORNEYS, P.L.L.C.  
Attorneys for Plaintiff  
110 South Main Street  
Mt. Clemens, MI 48043  
(586) 954-9500

Dated: March 11, 2025